

**Review of Extraordinary Circumstances
For
CACA-56344 and CACA-56371 Gold Basin Type I Met Towers**

The Department of the Interior Manual 516 2.3A (3) requires review of the following “extraordinary circumstances” (516 DM 2 Appendix 2) to determine if an otherwise categorically excluded action would require additional environmental analysis/documentation.

1) Have significant impacts on public health or safety.

☐ Yes ☒ No

Comments: The project is located on undeveloped land between Highway 78 and Black Mountain in Imperial County. There would be no hazardous or solid waste generated by the operation, maintenance, and eventual decommissioning of the met towers. No hazardous or solid wastes would be utilized or stored on site.

2) Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas.

☐ Yes ☒ No

Comments: The met towers are standing, and no new construction is proposed. The proposed action is not located in any designated parks, recreation or refuge lands, wilderness or wilderness study areas, proposed prime or unique farmlands, national natural landmark areas, or national monuments. No water use is proposed for the purpose of monitoring wind resources. There would not be any runoff to surface or ground water as a result of this project. Neither of the met towers are located in washes where riparian areas would be found. All cultural resources would be avoided.

3) Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources [NEPA Section 102(2) (E)].

☐ Yes ☒ No

Comments: The proposed action would be short-term (3 years or less) and would involve operation of wind testing and monitoring towers. The effects of the proposed action on the quality of the human environment are not considered highly controversial. While there is potential for controversy in regards to wind energy development in the area, the proposed action is for the continuous monitoring of wind resources for wind energy facilities already authorized.

4) *Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks.*

☐ Yes ☒ No

Comments: Overall, the proposed action and resultant environmental effects would be insignificant. Also, the proposed action would comply with the provisions established for land unclassified as established in the NECO Area (BLM 1980, as amended). This area is managed to provide for a variety of uses including renewable energy, wildlife conservation and recreation. Recreational activity in the area includes camping, hunting, hiking, horseback riding, backpacking, mountain biking, wildlife viewing, photography, and OHV use. The continued operation of the met towers is consistent with the allowable uses within this area under the NECO Plan.

5) *Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects.*

☐ Yes ☒ No

Comments: The proposed action would be short-term, involve no ground disturbance, and would not be capable of setting a precedent for future actions. There would be no cumulative effects on areas of critical environmental concern, prime or unique farmland, wild and scenic rivers, wilderness, or wilderness study areas because these elements do not occur on or adjacent to this project. The analysis of effects of the proposed action on air quality, biological resources, cultural resources, environmental justice, floodplains, hazardous or solid wastes, recreation, visual resources, water quality (surface/ground), and wetland/riparian zones indicates that these elements would not be affected by the proposed action. As a result, implementation of the proposed project would have no cumulative effects on these elements.

6) *Have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects.*

☐ Yes ☒ No

Comments: The proposed action is not related to other past, present, or reasonably foreseeable actions likely to result in any significant impacts. Testing and development are not connected actions under the Council on Environmental Quality's NEPA regulations (40 CFR 1508.25), as the site testing authorization does not automatically trigger any wind energy development project. The cumulative impacts of other wind energy site testing activities and any other reasonable foreseeable activities in the same area are not likely to result in cumulatively significant impacts.

7) *Have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by either the bureau or office.*

☐ Yes ☒ No

Comments: This undertaking would have no effect on historic properties.

8) *Have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat.*

☐ Yes ☒ No

Comments: The project is located within habitat for desert tortoise, but not within their critical habitat. The project would not adversely affect any sensitive, threatened, endangered, or proposed for listing species.

9) *Violate a Federal law, or a State, local, or tribal law or requirement imposed for the protection of the environment.*

☐ Yes ☒ No

Comments: The proposed action does not violate Federal, State, or local laws or requirements for the protection of the environment.

10) *Have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898).*

☐ Yes ☒ No

Comments: This proposed action could benefit Imperial County by supplying a source of information regarding the applicability of wind energy in this area. This would not detrimentally affect the minority and low-income populations of local communities. This project would not have disproportionate effects on low-income or minority populations because it is located in a remote uninhabited area of Imperial County.

11) *Limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (Executive Order 13007).*

☐ Yes ☒ No

Comments: The re-authorization of the existing met towers would have no affect on Indian sacred sites.

12) *Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112).*

() Yes (X) No

Comments: The proposed action would not involve clearing of vegetation. There would be no introduction or spread of noxious weeds or non-invasive species.

Reviewers:

//Signed//
Andrew Trouette, Botany/Invasive Species

10/30/2015
Date

//Signed//
Veronica Vogan, Realty Specialist

10/29/2015
Date

//Signed//
Carrie Simmons, Resources Branch Supervisor

10/30/2015
Date